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Attorneys for Defendant  
Premium Waters, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DAVID VANDERKLIPP, an individual,	)	Case No. 2:24-cv-00920-JAD-BNW
	)	
Plaintiff,	)	
	)	
vs.	)	<b><u>STIPULATION AND REQUEST TO</u></b>
	)	<b><u>EXTEND DISPOSITIVE MOTION</u></b>
	)	<b><u>DEADLINE</u></b>
PREMIUM WATERS, Inc., a Foreign	)	
Corporation,	)	<b><u>(First Request)</u></b>
	)	
Defendant.	)	
_____	)	

Plaintiff David VanderKlipp (“Plaintiff”), by and through his counsel of record, Trevor J. Hatfield, Esq., and Defendant Premium Waters, Inc., (“Defendant”), by and through its counsel of record, the law firm Kamer Zucker Abbott (collectively the “Parties”), stipulate and request that the Court extend the dispositive motion deadline by forty-five (45) days, to March 20, 2025.

In support of this Stipulation and Request, the Parties state as follows:

1. The current deadline for the Parties to file dispositive motions is February 3, 2025.
2. The Parties planned to complete Discovery by January 2, 2025. However, due to scheduling issues and in view of the Holidays, the parties mutually agreed to schedule depositions and provide final discovery responses slightly outside of the discovery period.

3. On December 22, 2024, Plaintiff requested a two-week extension to respond to Defendant's discovery requests.
4. On December 23, 2024, Defendant proposed to mutually extend the deadline to January 9, 2025 to respond to discovery requests.
5. On January 9, 2025, Plaintiff's counsel requested a deadline of January 17, 2025 for the parties to contemporaneously exchange discovery responses. Defendant agreed to a mutual deadline of January 17, 2025.
6. The parties agreed to schedule depositions at a mutually convenient time after providing discovery responses on January 17, 2025.
7. In light of the foregoing, the Parties stipulate to and request an extension of the dispositive motion deadline to March 20, 2025.
8. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the Parties solely for the purpose of accommodating the Parties cooperative efforts to complete the rescheduled depositions and file dispositive motions.

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1 WHEREFORE, the Parties respectfully request the Court extend the dispositive motion  
2 deadline by forty-five (45) days, to March 20, 2025.

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4 DATED this 10th day of January, 2025.

5 /s/ Trevor J. Hatfield  
HATFIELD & ASSOCIATES, LTD.  
6 Trevor J. Hatfield, Esq.  
7 703 South Eighth Street  
Las Vegas, Nevada 89101  
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8 Fax: (702) 386-9825  
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9 Attorney for Plaintiff,  
10 David VanderKlipp

DATED this 10th day of January, 2025.

5 /s/ Dare E. Heisterman  
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Attorneys for Defendant  
Premium Waters, Inc.

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13 **IT IS SO ORDERED**

14 **DATED:** 10:33 am, January 13, 2025

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17 **BRENDA WEKSLER**  
18 **UNITED STATES MAGISTRATE JUDGE**